

1 W. West Allen
2 Nevada Bar. No. 5566
HOWARD & HOWARD ATTORNEYS PLLC
3800 Howard Hughes Parkway, Suite 1000
3 Las Vegas, Nevada 89169
4 Telephone: (702) 257-1483
wwa@h2law.com

Sasha Rao (*pro hac vice pending*)
MAYNARD COOPER & GALE, LLP
Transamerica Pyramid Center
600 Montgomery Street
Suite 2600
San Francisco, CA 94111
Telephone: (415) 646-4702
srao@maynardcooper.com

5 Ashe Puri (*pro hac vice to be filed*)
6 MAYNARD COOPER & GALE, LLP
1925 Century Park East, Suite 1700
7 Los Angeles, California 90067
Telephone: (310) 596-4344
apuri@maynardcooper.com

8 *Attorneys for Defendant, iPGARD Inc.*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 HIGH SEC LABS LTD.,

Case No.: 2:20-cv-01797-MMD-BNW

13 Plaintiff,

14 v.

15 iPGARD INC.,

16 Defendants.

**STIPULATION AND ORDER FOR
45-DAY EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

(FIRST REQUEST)

17
18 Pursuant to LR IA 6-1, 6-2, and LR 7-1, Plaintiff HIGH SEC LABS LTD. (“Plaintiff”) and
19 Defendant iPGARD Inc. (“Defendant”), by and through their respective counsel of record, hereby
20 stipulate and agree to a 45-day extension of time for Defendant to respond to the Complaint, as
21 follows:

22 1. Plaintiff commenced this action by filing a Complaint (ECF No. 1) on September 25,
23 2020.

24 2. Defendant recently retained defense counsel, Maynard Cooper & Gale, LLC and
25 Howard & Howard Attorneys PLLC, after learning of this lawsuit. The parties have agreed to
26 stipulate to 45-day extension of time for Defendant to respond to the Complaint to allow Defendant a
27 reasonable time to review Plaintiff’s Complaint and prepare a response. Accordingly, Defendant will
28 have until December 7, 2020 to respond to the Complaint.

1 3. Defendant agrees that it will not dispute Plaintiff's service of the Complaint in
2 exchange for Plaintiff's agreement to a 45-day extension of time, and that Defendant will respond to
3 the Complaint by December 7, 2020 absent any further extension of time either by agreement of the
4 parties or by motion to the Court.

5 THEREFORE, Plaintiff and Defendant hereby stipulate and agree that Defendant's time to
6 answer or otherwise respond to Plaintiff's Complaint shall be extended to and include December 7,
7 2020.

8 DATED: October 21, 2020.

8 DATED: October 21, 2020.

9 WEIDE & MILLER, LTD.

9 HOWARD & HOWARD ATTORNEYS PLLC

10 */s/ F. Christopher Austin*
11 F. Christopher Austin, Esq.
12 10655 Park Run Drive, Suite 100
12 Las Vegas, Nevada 89144

10 */s/ W. West Allen*
11 W. West Allen, Esq.
12 3800 Howard Hughes Pkwy., Suite 1000
12 Las Vegas, Nevada 89169

13 *Attorneys for Plaintiff*

13 *Attorneys for Defendant*

15 **IT IS SO ORDERED**

16 **DATED:** 6:20 pm, October 23, 2020

17 

18 **BRENDA WEKSLER**
19 **UNITED STATES MAGISTRATE JUDGE**